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April 26, 2024

BY ECF

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Stein et al. v. Skatteforvaltningen, No. 23-cv-02508 (NRB)

Dear Judge Buchwald:

We write on behalf of defendant/counterclaim plaintiff Skatteforvaltningen (“SKAT”), plaintiffs/counterclaim defendants Matthew Stein and Jerome Lhote and third-party defendant Luke McGee in accordance with Section 1.E of the Court’s Individual Practices to jointly request a 30-day extension of the remaining deadlines for the completion of fact discovery, and a corresponding but shorter 21-day extension of the remaining deadlines for the completion of expert discovery.

Pursuant to the previously entered schedule (ECF No. 98), the deadline for the completion of fact depositions and to serve written discovery is May 1, 2024. The parties request that this date be extended to May 31, 2024 in order to accommodate deposition scheduling issues for the witnesses and counsel, including counsel’s travel to Denmark and West Palm Beach for two depositions, and one witness’ travel from Denmark to New York for another deposition. In the event that the extension is granted, the parties have agreed upon dates for all fact witness depositions to be completed by the proposed May 31, 2024 deadline. As a result of the requested extension of the fact discovery deadline, the parties also jointly request a 21-day extension to complete expert discovery. Attached to this letter is a proposed revised scheduling order with the requested new deadlines.

This is the parties' first request for an extension of the fact and expert discovery deadlines.

Respectfully submitted,

/s/ Marc A. Weinstein  
Marc A. Weinstein

cc: all counsel of record, via ECF